

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

ANGELA STUDDARD, INDIVIDUALLY AND AS
LAWFUL WIFE, NEXT OF KIN, ADMINISTRATOR AD LITEM
AND PERSONAL REPRESENTATIVE
FOR EDMOND STUDDARD, DECEASED AND
ESTATE OF EDMOND STUDDARD

Plaintiff,

VS.

Civil Action No. 2:17-cv-02517

JURY DEMANDED

ERIN J. SHEPHERD, INDIVIDUALLY AND
AS EMPLOYEE OR AGENT OF SHELBY COUNTY, TENNESSEE
And TERRY I. REED, INDIVIDUALLY AND AS
EMPLOYEE OR AGENT OF SHELBY COUNTY, TENNESSEE

Defendants.

PLAINTIFF'S MOTIONS IN LIMINE

Comes now the Plaintiff, by and through counsel of record and would file the Plaintiff's
Motions in Limine in this cause and would respectfully requests from this Honorable Court an
Order granting Plaintiff's Motion in Limine.

1. Plaintiff respectfully requests from this Honorable Court to enter an order excluding any
mention, reference, testimony and/or evidence relating to any prior arrest of Edmond Studdard in
this cause. Plaintiff would respectfully state that to allow the jury in this cause to hear any

evidence regarding an arrest of Edmond Studdard would not be relevant to this proceeding pursuant to Rule 401 of the Federal Rules of Evidence. Further, any mention and/or evidence of Edmond Studdard being arrested for any crime and/or without conviction would be highly prejudicial to the Plaintiff and any such probative value would be greatly outweighed by the prejudicial effect of said evidence and/or testimony.

2. Plaintiff respectfully requests from this Honorable Court an order excluding any reference, mention, testimony and/or evidence relating to Edmond Studdard's possession of aluminum foil contained within his wallet after he was shot. Edmond Studdard did not have possession of any drugs on the date that he was shot and any reference and/or testimony and/or evidence relating to Edmond Studdard's possession of a legal household item in his wallet without any other evidence would not be relevant to the issues in this cause pursuant to Rule 401 of the Federal Rules of Evidence. Further, any testimony, reference and/or evidence relating to said possession of aluminum foil would be highly prejudicial and the prejudicial effect of said evidence would greatly outweigh any probative value of said evidence pursuant to Rule 403 of the Federal Rules of Evidence.

3. Plaintiff respectfully requests from this Honorable Court an order excluding any evidence relating to the internal investigation performed by the Shelby County Sheriff's Department regarding the eventual decision to exonerate the Defendants related to the shooting of Edmond Studdard. Plaintiff would respectfully state that Plaintiff was not involved in said internal investigation and did not have an opportunity to cross examine any witnesses and/or produce and evidence for said investigation. Plaintiff would respectfully state that said internal investigation is subject to bias on behalf of the Shelby County Sheriff's Department and there is no relevance to the issues in this lawsuit and therefore should be excluded pursuant to Rule 401

of the Federal Rules of Evidence. Further, any relevance to the investigation and ultimate exoneration by the Shelby County Sheriff's Department is greatly outweighed by the prejudicial effect of said evidence over any probative value of said evidence pursuant to Rule 403 of the Federal Rules of Evidence.

Respectfully submitted,

s/Daniel A. Seward
Daniel A. Seward
Attorney for Plaintiff
Seward Law Firm
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Memphis, TN 38117
(901) 647-5848

CERTIFICATE OF SERVICE

I, Daniel A. Seward, Attorney for Plaintiff, do hereby certify that I have served a true and correct copy of the foregoing Motion for Extension of Time on Mr. John Marshall Jones and Mr. E. Lee Whitwell, Attorneys for Defendants, via email and/or ecf filing on this the 14th day of February, 2020.

s/ Daniel A. Seward
Daniel A. Seward